

November 18, 2002

RE: Rieter Automotive North America, Inc
TO: Interested Parties / Applicant

089-12599-00013

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within (18) eighteen days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for consideration at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

(over)

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
Administrator, Christine Todd Whitman
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosure

FNTVPMOD.wpd 8/21/02

November 18, 2002

James Roark
Rieter Automotive North America, Inc.
101 West Oakley Street
Lowell, Indiana 46356

Re: 089-12599
Second Significant Permit Modification to
Part 70 089-6629-00013

Dear James Roark:

Rieter Automotive North America, Inc. was issued a Title V permit on June 16, 1999 for a stationary automotive sound deadening products manufacturing operation. A letter requesting a change was received on July 19, 1999. Pursuant to the provisions of 2-7-12, a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

Multiple changes, including a proposed State Implementation Plan (SIP) revision, are being made to the permit. The site specific reasonably available control technology determination will be submitted to the U.S. EPA as a SIP revision and will become federally enforceable upon approval by the U.S. EPA.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Donald R. Poole, at (800) 451-6027, press 0 and ask for Donald Poole or extension (2-8327), or dial (317) 232-8327.

Sincerely,

Original signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

drp

cc: File - Lake County
U.S. EPA, Region V
Lake County Health Department
Northwest Regional Office
Air Compliance Section Inspector - Rick Massoels/Ramesh Tejuja
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner
Office of Legal Counsel - Aaron Schmoll

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Rieter Automotive North America, Inc.
101 West Oakley Avenue
Lowell, Indiana 46356-2206**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T089-6629-00013	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: June 16, 1999
First Administrative Amendment 089-11497 issued November 24, 1999. Second Administrative Amendment 089-12125 issued April 20, 2000. First Minor Permit Modification 089-12506 issued September 26, 2000. Third Administrative Amendment 089-12693 issued October 17, 2000. Second Minor Permit Modification 089-14668 issued October 10, 2001. Fourth Administrative Amendment 089-14776 issued October 9, 2001. First Significant Permit Modification 089-15455 issued July 30, 2002.	
Second Significant Permit Modification 089-12599	Pages Amended: 3 - 6, 31-33, and 53a -53c
Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: November 18, 2002

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary automotive sound deadening products manufacturing operation.

Responsible Official: Jeff Windlow
Source Address: 101 West Oakley Street, Lowell, Indiana 46356-2206
Mailing Address: 101 West Oakley Street, Lowell, Indiana 46356-2206
Phone Number: 219-696-5100
SIC Code: 3714
County Location: Lake
County Status: Severe Nonattainment Area for Ozone
Attainment for all other Criteria Pollutants
Source Status: Part 70 Permit Program
Major Source under PSD Rules;
Major Source under Emission Offset Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) One (1) hot molding department, identified as HMD, constructed prior to 1978, with a maximum capacity of 2,794 pounds of trimmed parts and scrap per hour, exhausting to three (3) stacks (HV-1, HV-2, and HV-3), consisting of the following equipment:
 - (A) Nine (9) hot molding presses, known as: OTT-7, OTT-4, HAM-12, ERIE-8, HAM-11, HAM-15, OTT-1, HAM-10, and W&W-6
 - (B) Thirteen (13) cooling bucks,
 - (C) Two (2) heaters in the Hot Mold Department with a combined maximum heat input capacity of 12.0 million British thermal units per hour (mmBtu/hr), each installed in 1990, identified as FCU-13 and FCU-14. This equipment is considered to be part of the Indirect Heating and Fuel Combustion Units, and
 - (D) Three (3) mold presses, identified as HETT-1, HETT-2, and HETT-3 each with a maximum capacity of 622 pounds of pads and 10.2 pounds of DOW films per hour, all exhausting to stack HV-1.
 - (E) One (1) reverse roll coater with maximum capacity of 10,800 pounds of Foam per hour and hot melt of 143 pounds per hour, and
 - (F) One (1) EA laminator with 10,943 pounds of Foam and hot melt per hour and 154 pounds of spunbond per hour.
- (2) One (1) foam part line, identified as F.P. Line, constructed in August, 1995, with a maximum capacity of 1,277 pounds of trimmed parts and scrap per hour, exhausting to two (2) stacks (FP-1 and FP-2), consisting of the following equipment:
 - (A) One (1) electric oven with maximum throughput of 669 pounds of foam sheet and KDA damper per hour.

- (3) One (1) CJ line, identified as CJ Line, constructed in 1991, with a maximum capacity of 2,800 pounds of trimmed parts and scrap per hour, exhausting to one (1) stack (FCU-15), that can be used to mold either fully cured pad with barriers with maximum throughput of 2,791 pounds per hour or to mold foam pad with damper with maximum throughput of 1,277 pounds per hour, consisting of the following equipment:
 - (A) One (1) 2.5 million British thermal units per hour natural gas fueled CJ oven, identified as FCU-15.
- (4) Department 44, identified as D44, constructed in 1981, with a maximum capacity of 5,246 pounds of trimmed parts and scrap per hour, exhausting to one (1) stack (FCU-16), consisting of the following equipment:
 - (A) One (1) 2.5 million British thermal units per hour (mmBtu/hr) natural gas fired Line 44 Oven, identified as FCU-16, and
 - (B) One (1) 1.0 million British thermal units per hour (mmBtu/hr) natural gas fired Line 44 Oven, also identified as FCU-16.
- (5) Line 2, identified as L2, constructed in the 1970s, with a maximum capacity of 3,744 pounds of saturated felt parts and trim scrap per hour, exhausting to one (1) stack (SV-1), consisting of the following equipment:
 - (A) One (1) asphalt saturator with maximum capacity of 15,900 square feet of damper per hour,
 - (B) One (1) coater #1 using flexcyl with maximum capacity of 15,900 square feet of damper per hour and 63.6 gallons of flexcyl per hour,
 - (C) One (1) coater #2 using fuller glue with maximum capacity of 15,900 square feet of damper per hour and 31.8 gallons of fuller glue per hour, and
 - (D) One (1) 4.80 million British thermal units per hour (mmBtu/hr) natural gas fired Line 2 oil heater, installed prior to 1983, identified as FCU-10.
- (6) Lines 6 and 7, identified as L6&7, constructed in the 1960s, with a maximum capacity of 13,200 pounds of products per hour, using twelve (12) baghouses as control, exhausting to twelve (12) stacks (BH-1, BH-2, BH-3, BH-4, BH-5, BH-6, BH-7, BH-8, BH-9, BH-10, BH-11 and BH-12), consisting of the following equipment:
 - (A) One (1) 0.307 million British thermal units per hour natural gas fired predryer infrared oven,
 - (B) One (1) reverse roll coater with maximum capacity of 21,750 square feet of barrier and damper sheet (filled asphaltic sheet) per hour, Line 6
 - (C) One (1) bag dump station with baghouse BH-12,
 - (D) Nine (9) pneumatically loaded silos (#9 - #17), with a combined capacity of 46,945 pounds per hour,
 - (E) One (1) vacuum receiver, maximum throughput 108 pounds per hour, Line 6
 - (F) One (1) bag dump station, containing calcium oxide, with baghouse BH-11
 - (G) Two (2) reverse roll coaters, with maximum capacity of 13,050 square feet of barrier sheet (filled asphaltic sheet) per hour each, Line 7
 - (H) One (1) 4.80 million British thermal units per hour (mmBtu/hr) natural gas fired Lines 6 & 7 oil heater, installed prior to 1983, identified as FCU-11.
- (7) Line 8, identified as L8, constructed in 1989, with a maximum capacity of 14,000 pounds of products per hour, using thirteen (13) baghouses as control, exhausting to thirteen (13)

- stacks (BH-13, BH-14, BH-15, BH-16, BH-17, BH-18, BH-19, BH-20, BH-21, BH-22, BH-23, BH-24 and BH-25), consisting of the following equipment:
- (A) Two (2) bag dump stations:
 - (1) One (1) bag dump station (Bag Fill), capacity 4,000 pounds per hour,
 - (2) One (1) bag dump station (Calcium Oxide), capacity 108 pounds per hour,
 - (B) One (1) vacuum receiver, capacity 108 pounds per hour,
 - (C) Ten (10) storage silos with combined capacity of 53,914 pounds per hour,
 - (D) Two (2) reverse roll coaters, with maximum capacity of 36,000 square feet of barrier and damper sheet (filled asphaltic sheet) per hour each,
 - (E) One (1) 6.00 million British thermal units per hour (mmBtu/hr) natural gas fired Line 8 oil heater, installed in 1991, identified as FCU-12.
- (8) Line 92, identified as L92, constructed in 1966, with a maximum capacity of 3,280 pounds of products per hour, using three (3) baghouses and one (1) thermal oxidizer as control, exhausting to one (1) stack (FCU-4), consisting of the following equipment:
- (A) One (1) fiberglass receiver, maximum capacity of 1,800 pounds per hour,
 - (B) One (1) fiberglass opener,
 - (C) Four (4) virgin cotton fiber bale breakers, maximum capacity of 2,000 pounds per hour each,
 - (D) One (1) conveyor, maximum capacity of 6,000 pounds per hour,
 - (E) One (1) fiber blender opener, maximum capacity of 6,000 pounds per hour,
 - (F) One (1) rotoblender, maximum capacity of 6,000 pounds per hour,
 - (G) One (1) feed hopper,
 - (H) One (1) air lay,
 - (I) One (1) reclaim screen,
 - (J) One (1) classifier,
 - (K) One (1) picker,
 - (L) One (1) resin distributor,
 - (M) One (1) 15 million British thermal units per hour natural gas fired incinerator,
 - (N) One (1) 11.20 million British thermal units per hour (mmBtu/hr) natural gas fired Line 92 boiler, installed in 1995, identified as NAVA Oven Boiler, and
 - (O) One (1) 0.5 million British thermal units per hour (mmBtu/hr) natural gas fired Line 92 Dryer, identified as NAVA Oven.
- (9) One (1) liquid organic storage tank area, identified as VOLS, with a maximum capacity of 227,200 gallons of organic liquid, consisting of the following equipment:
- (A) One (1) fixed roof dome tank, installed in 1989, identified as Line 8 (Flux), storing asphalt, with capacity of 30,000 gallons;

- (B) One (1) fixed roof dome tank, installed in 1989, identified as Line 8 (Coating), storing asphalt, with capacity of 30,000 gallons;
 - (C) One (1) fixed roof dome tank, installed in 1989, identified as Line 8 B-25, storing asphalt, with capacity of 30,000 gallons;
 - (D) One (1) fixed roof dome tank, installed in 1989, identified as Line 8 Latex #1, storing Latex, with capacity of 3,700 gallons;
 - (E) One (1) fixed roof dome tank, installed in 1989, identified as Line 8 Latex #2, storing Latex, with capacity of 3,700 gallons;
 - (F) One (1) fixed roof dome tank, installed prior to 1970, identified as Process Oil, storing Process Oil, with capacity of 13,500 gallons;
 - (G) One (1) fixed roof dome tank, installed in 1990, identified as Antifreeze #1, storing Antifreeze, with capacity of 1,128 gallons;
 - (H) One (1) fixed roof dome tank, installed in 1990, identified as Antifreeze #2, storing Antifreeze, with capacity of 1,128 gallons;
 - (I) One (1) fixed roof dome tank, installed in 1976, identified as Line 6 & 7 (Flux), storing asphalt, with capacity of 30,455 gallons;
 - (J) One (1) fixed roof dome tank, installed in 1976, identified as Line 6 & 7 (Coating), storing asphalt, with capacity of 30,455 gallons;
 - (K) One (1) fixed roof dome tank, installed in 1976, identified as Line 6 & 7 B-25, storing asphalt, with capacity of 30,455 gallons;
 - (L) One (1) fixed roof dome tank, installed in 1986, identified as Waste Oil, storing Waste Oil, with capacity of 2,970 gallons;
 - (M) One (1) fixed roof dome tank, installed in 1990, identified as HT Oil, storing Heat Transfer Oil, with capacity of 1,128 gallons;
 - (N) One (1) fixed roof dome tank, installed in 1990, identified as Lube Oil, storing Lube Oil, with capacity of 1,128 gallons;
 - (O) One (1) fixed roof dome tank, installed in 1976, identified as Line 6 & 7 Latex, storing Latex, with capacity of 3,700 gallons;
 - (P) One (1) 3.0 million British thermal units per hour (mmBtu/hr) natural gas fired asphalt tank heater, identified as FCU-6;
 - (Q) One (1) 3.0 million British thermal units per hour (mmBtu/hr) natural gas fired asphalt tank heater, identified as FCU-7; and
 - (R) One (1) 3.0 million British thermal units per hour (mmBtu/hr) natural gas fired asphalt tank heater, identified as FCU-8.
- (10) Line 91, identified as L91, constructed in 1978, with a maximum capacity of 3,823 pounds of product per hour, using three (3) baghouses and one (1) thermal oxidizer as control, exhausting to one (1) stack (FCU-2)(new), consisting of the following equipment:
- (A) One (1) existing rebuilt conventional oven (FCU-1) rated at 9 million British thermal units per hour (mmBtu/hr) connected through new modified duct work to a new thermal oxidizer rated at 15 million British thermal units per hour (mmBtu/hr), using a low NOx burner as control, exhausting to one (1) stack (FCU-2 (new)).

- (B) Four (4) bale breakers;
 - (C) One (1) feed hopper.
 - (D) One (1) fiber opener,
 - (E) One (1) airway,
 - (F) One (1) classifier,
 - (G) One (1) reclaim screen,
 - (H) One (1) picker,
 - (I) One (1) resin distributor, and
 - (J) Two (2) aspirator tables.
- (11) One (1) foam part cell, identified as Foam Cell Injection Molding, under construction 1997/1998, with a maximum capacity of 4,273.1 pounds of trimmed parts and scrap per hour, consisting of the following equipment:
- (A) Two (2) chemical storage tanks, 8,000 gallon capacity each,
 - (B) One (1) metering system,
 - (C) One (1) robotic injector, and
 - (D) One (1) nitrogen blank system for chemical storage tanks.
- (12) One (1) natural gas-fired 350 BHP VAPOR Circulate steam generator, with a maximum heat input of 14.3 MMBTU/hr.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) One (1) 8.38 million British thermal units per hour (mmBtu/hr) natural gas fired boiler, installed prior to 1983, identified as FCU-5;
- (2) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than or equal to 12,000 gallons.
- (3) Fifty-two (52) natural gas fired space heaters and four (4) air makeup units with a combined maximum heat input capacity of 54.75 million British thermal units per hour (mmBtu/hr), each with individual heat capacities less than ten (10) million British thermal units. This equipment is considered to be part of the Direct Heating and Fuel Combustion Units,
- (4) VOC and HAP vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids,
- (5) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings,
- (6) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment,
- (7) Closed loop heating and cooling systems,

- (8) Water based adhesives that are less than or equal to 5% by volume of VOC's excluding HAPs,
- (9) Replacement of repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment,
- (10) Paved and unpaved roads and parking lots with public access,
- (11) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling towers,
- (12) A laboratory as defined in 326 IAC 2-7-1(21)(D),
- (13) One (1) 200 horsepower primary fire pump, fueled by #1 diesel fuel and one (1) 285 gallon fuel tank, and
- (14) One (1) 110 horsepower emergency fire pump, fueled by #1 diesel fuel and one (1) 275 gallon fuel tank.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22); and
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B

GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over

any of the furnished records, the Permittee must furnish such records to IDEM, OAM along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
- (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year (the first report shall cover the time period from the date of issuance of the Part 70 Permit to December 31), and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
 - (5) Any insignificant activity that has been added without a permit revision;
 - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM.

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-888-209-8892 (ask for Office of Air Management, Compliance Section), or
Telephone Number: 219-881-6712 (ask for Compliance Section)
Facsimile Number: 219-881-6745

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(10) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
 - (g) Operations may continue during an emergency only if the following conditions are met:

- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM has issued the modification. [326 IAC 2-7-12(b)(7)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.
- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

**B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:

- (1) That this permit contains a material mistake.
- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
 - (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable

under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]
 - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM nor an authorized representative, may disclose the information unless and until IDEM, OAM makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
 - (2) The Permittee, and IDEM, OAM acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six minute averaging period, as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.2 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.3 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. This condition is not federally enforceable.

C.4 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.5 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or

(C) Waste disposal site.

- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.7 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.8 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

C.9 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.10 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.12 Pressure Gauge or Temperature Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop or temperature across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
- (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that

reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this

permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.18 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping

that would otherwise be required by this permit.

- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM representative, for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner (or local agency) makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or local agency within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate

who performed the tasks.

- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (1) One (1) hot molding department, identified as HMD, constructed prior to 1978, with a maximum capacity of 2,794 pounds of trimmed parts and scrap per hour, exhausting to three (3) stacks (HV-1, HV-2, and HV-3), consisting of the following equipment:
 - (A) Nine (9) hot molding presses, known as: OTT-7, OTT-4, HAM-12, ERIE-8, HAM-11, HAM-15, OTT-1, HAM-10, and W&W-6
 - (B) Thirteen (13) cooling bucks, and
 - (C) Two (2) heaters in the Hot Mold Department with a combined maximum heat input capacity of 12.0 million British thermal units per hour (mmBtu/hr), each installed in 1990, identified as FCU-13 and FCU-14. This equipment is considered to be part of the Indirect Heating and Fuel Combustion Units.
 - (D) Three (3) mold presses, identified as HETT-1, HETT-2, and HETT-3, each with a maximum capacity of 622 pounds of pads and 10.2 pounds of DOW films per hour, all exhausting to stack HV-1.
 - (E) One (1) reverse roll coater with maximum capacity of 10,800 pounds of Foam per hour and hot melt of 143 pounds per hour, and
 - (F) One (1) EA laminator with 10,943 pounds of Foam and hot melt per hour and 154 pounds of spunbond per hour.
- (2) One (1) foam part line, identified as F.P. Line, constructed in August, 1995, with a maximum capacity of 1,277 pounds of trimmed parts and scrap per hour, exhausting to two (2) stacks (FP-1 and FP-2), consisting of the following equipment:
 - (A) One (1) electric oven with maximum throughput of 669 pounds of foam sheet and KDA damper per hour.
- (3) One (1) CJ line, identified as CJ Line, constructed in 1991, with a maximum capacity of 2,800 pounds of trimmed parts and scrap per hour, exhausting to one (1) stack (FCU-15), that can be used to mold either fully cured pad with barriers with maximum throughput of 2,791 pounds per hour or to mold foam pad with damper with maximum throughput of 1,277 pounds per hour, consisting of the following equipment:
 - (A) One (1) 2.5 million British thermal units per hour natural gas fueled CJ oven identified as FCU-15, and
- (4) Department 44, identified as D44, constructed in 1981, with a maximum capacity of 5,246 pounds of trimmed parts and scrap per hour, exhausting to one (1) stack (FCU-16), consisting of the following equipment:
 - (A) One (1) 2.5 million British thermal units per hour (mmBtu/hr) natural gas fired Line 44 Oven, identified as FCU-16, and
 - (B) One (1) 1.0 million British thermal units per hour (mmBtu/hr) natural gas fired Line 44 Oven, also identified as FCU-16.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a) (Particulate Emission Limitations):

- (A) The PM from the one (1) hot molding department shall not exceed 0.03 grains per dry standard cubic foot. See the following table for the equivalent pound per hour emissions:

Emission Units/Stack	Flow Rate (acfm)	326 IAC 6-1-2(a) limitation (gr/dscf)	Equivalent limit in pounds per hour
HMP-4, HMP-5, HMP-6, HMP-7 / HV-2	70,467	0.03	18.12
HMP-1, HMP-2, HMP-3, HETT-1, HETT-2, HETT-3 / HV-1	22,076	0.03	5.67
HMP-8, HMP-9 / HV-3	54,083	0.03	13.90

- (B) The PM from the one (1) foam part line shall not exceed 0.03 grains per dry standard cubic foot. See the following table for the equivalent pound per hour emissions:

Emission Units/Stack	Flow Rate (acfm)	326 IAC 6-1-2(a) limitation (gr/dscf)	Equivalent limit in pounds per hour
Electric Oven / FP-1	4,000	0.03	1.02
Electric Oven / FP-2	4,000	0.03	1.02

- (C) The PM from the one (1) CJ Line shall not exceed 0.03 grains per dry standard cubic foot. See the following table for the equivalent pound per hour emissions:

Emission Units/Stack	Flow Rate (acfm)	326 IAC 6-1-2(a) limitation (gr/dscf)	Equivalent limit in pounds per hour
CJ Oven / FCU-15	4,000	0.03	1.02

- (D) The PM from Department 44 shall not exceed 0.03 grains per dry standard cubic foot. See the following table for the equivalent pound per hour emissions:

Emission Units/Stack	Flow Rate (acfm)	326 IAC 6-1-2(a) limitation (gr/dscf)	Equivalent limit in pounds per hour
Line 44 Oven / FCU-16	1,000	0.03	0.25

D.1.2 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Emission Limitations for Facilities specified in 326 IAC 6-2-1(c)), the particulate matter emissions from the two (2) natural gas fired heaters with combined heat input capacity 12.0 mmBtu/hr are limited to 0.45 pounds per million British thermal units per hour (lb/mmBtu).

This limitation is based on the following equation:

$$Pt = 1.09 / Q^{0.26}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/mmBtu).

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case the capacity specified in the operation permit shall be used.

D.1.3 Site Specific Reasonably Available Control Technology [326 IAC 8-1-5]

- a) Pursuant to 326 IAC 8-1-5, RACT for the Hot Molding Department shall be that:
- 1) The VOC emissions shall not exceed 5.33 pounds of VOC per ton of production. Total production shall not exceed ten thousand six hundred and twenty six (10,626) tons per twelve consecutive month period with compliance determined at the end of each month. These limits will limit VOC emissions to less than 28.32 tons per twelve consecutive month period.
 - 2) The equipment be operated in an efficient manner.
- b) Pursuant to 326 IAC 8-1-5, RACT for the CJ line shall be that:
- 1) The VOC emissions shall not exceed 0.198 pounds of VOC per ton of production. Total production shall not exceed twelve thousand one hundred and twenty one (12,121) tons per 12 consecutive month period with compliance determined at the end of each month. These limits will limit VOC emissions to less than 1.2 tons per twelve

consecutive month period.

2) The equipment be operated in an efficient manner.

c) Pursuant to 326 IAC 8-1-5, RACT for Department 44 shall be that:

1) The VOC emissions shall not exceed 0.198 pounds of VOC per ton of production. Total production shall not exceed twenty three thousand two hundred and thirty two (23,232) tons per twelve consecutive month period with compliance determined at the end of each month. These limits will limit VOC emissions to less than 2.3 tons per twelve consecutive month period.

2) The equipment be operated in an efficient manner.

These conditions are not federally enforceable.

D.1.4 VOC Emission Limits [326 IAC 8-7-3]

For the Hot Molding Department, CJ line, and Department 44, the facilities shall:

a) Achieve an overall VOC reduction from baseline actual emissions of at least ninety-eight percent (98%) by the documented reduction in use of VOC containing materials or install an add-on control system that achieves an overall control efficiency of ninety-eight percent (98%), or

b) Where it can be demonstrated by the source that control technology does not exist that is reasonably available and both technologically and economically feasible to achieve a ninety-eight percent (98%) reduction in VOC emissions, a source shall achieve an overall VOC reduction of at least eighty-one percent (81%) from baseline actual emissions with the documented reduction in use of VOC containing materials or install an add-on control system that achieves an overall control efficiency of eighty-one percent (81%).

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Particulate Matter (PM) limits specified in Conditions D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.6 Monitoring

Monitoring of these facilities is not specifically required by this permit. However, any change or modification to these facilities as specified in 326 IAC 2-1, may require this facility to have monitoring requirements.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19]

D.1.7 Record Keeping Requirements

To document compliance with Condition D.1.3(a), (b), and (c), the Permittee shall maintain monthly records of production from the Hot Molding Department, CJ line, and Department 44.

D.1.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.3(a), (b), and (c) shall be submitted to the addresses, listed in Section C - General Reporting Requirements, of this permit using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (5) Line 2, identified as L2, constructed in the 1970s, with a maximum capacity of 3,744 pounds of saturated felt parts and trim scrap per hour, exhausting to one (1) stack (SV-1), consisting of the following equipment:
- (A) One (1) asphalt saturator with maximum capacity of 15,900 square feet of damper per hour,
 - (B) One (1) coater #1 using flexcryl with maximum capacity of 15,900 square feet of damper per hour and 63.6 gallons of flexcryl per hour,
 - (C) One (1) coater #2 using fuller glue with maximum capacity of 15,900 square feet of damper per hour and 31.8 gallons of fuller glue per hour,
 - (D) One (1) 4.80 million British thermal units per hour (mmBtu/hr) natural gas fired Line 2 oil heater, installed prior to 1983, identified as FCU-10.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a) (Particulate Emission Limitations), the PM from Line 2 shall not exceed 0.03 grains per dry standard cubic foot. See the following table for the equivalent pound per hour emissions:

Emission Units/Stack	Flow Rate (acfm)	326 IAC 6-1-2(a) limitation (gr/dscf)	Equivalent limit in pounds per hour
Line 2 Asphalt Saturator / SV-1	2,760	0.03	0.70

D.2.2 Particulate Matter (PM) [326 IAC 6-2-2]

Pursuant to 326 IAC 6-2-2 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(a)), the particulate matter emissions from the one (1) 4.8 mmBtu/hr natural gas fired Line 2 oil heater shall be limited to 0.54 pounds particulate matter per million British thermal unit (lb/mmBtu).

This limit is based on the following equation:

$$Pt = 0.87 / Q^{0.16}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/mmBtu).

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case the capacity specified in the operation permit shall be used.

D.2.3 Volatile Organic Compound (VOC) [326 IAC 8-2-11]

Pursuant to 326 IAC 8-2-11 (Fabric and Vinyl Coating Operations), no owner or operator of a facility engaged in the surface coating of fabric or vinyl may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 2.9 pounds of VOC per gallon of coating excluding water, delivered to coating applicator when coating fabric and 4.8 pounds of VOC per gallon of coating excluding water, delivered to the coating applicator when coating vinyl.

Compliance Determination Requirements

D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Particulate Matter (PM) and Volatile Organic Compound (VOC) limits specified in Conditions D.2.1 and D.2.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.2.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.6 Monitoring

Monitoring of these facilities is not specifically required by this permit. However, any change or modification to these facilities as specified in 326 IAC 2-1, may require this facility to have monitoring requirements.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.7 Record Keeping Requirements

(a) To document compliance with Condition D.2.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.3.

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

When non-compliant coatings are used, the following records shall be kept:

- (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each day;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (6) Lines 6 and 7, identified as L6&7, constructed in the 1960s, with a maximum capacity of 13,200 pounds of products per hour, using twelve (12) baghouses as control, exhausting to twelve (12) stacks (BH-1, BH-2, BH-3, BH-4, BH-5, BH-6, BH-7, BH-8, BH-9, BH-10, BH-11 and BH-12), consisting of the following equipment:
- (A) One (1) 0.307 million British thermal units per hour natural gas fired predryer infrared oven,
 - (B) One (1) reverse roll coater with maximum capacity of 21,750 square feet of barrier and damper sheet (filled asphaltic sheet) per hour, Line 6,
 - (C) One (1) bag dump station with baghouse BH-12,
 - (D) Nine (9) pneumatically loaded silos (#9 - #17), with a combined capacity of 46,945 pounds per hour,
 - (E) One (1) vacuum receiver, maximum throughput 108 pounds per hour, Line 6,
 - (F) One (1) bag dump station, containing calcium oxide, with baghouse BH-11,
 - (G) Two (2) reverse roll coaters, with maximum capacity of 13,050 square feet of barrier sheet (filled asphaltic sheet) per hour each, Line 7,
 - (H) One (1) 4.80 million British thermal units per hour (mmBtu/hr) natural gas fired Lines 6 & 7 oil heater, installed prior to 1983, identified as FCU-11.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a) (Particulate Emissions Limitations), the PM from the bulk handling operations in Lines 6 & 7 shall not exceed 0.03 grains per dry standard cubic foot. See the following table for the equivalent pound per hour emissions:

Emission Units/Stack	Flow Rate (acfm)	326 IAC 6-1-2(a) limitation (gr/dscf)	Equivalent limit in pounds per hour
Bag Fill / BH-1	600	0.03	0.15
Bag Fill / BH-2	600	0.03	0.15
Bag Fill / BH-3	600	0.03	0.15
Bag Fill / BH-4	600	0.03	0.15
Truck Fill / BH-5	600	0.03	0.15
Truck Fill / BH-6	600	0.03	0.15
Truck Fill / BH-7	600	0.03	0.15
Truck Fill / BH-8	600	0.03	0.15
Truck Fill / BH-9	600	0.03	0.15
Vacuum Receiver / BH-10	600	0.03	0.15
Bag Dump Station / BH-11	1,000	0.03	0.25
Bag Dump Station / BH-12	1,000	0.03	0.25

D.3.2 Particulate Matter (PM) [326 IAC 6-2-2]

Pursuant to 326 IAC 6-2-2 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(a)), the particulate matter emissions from the one (1) 4.8 mmBtu/hr natural gas fired Lines 6 & 7 oil heater shall be limited to 0.54 pounds particulate matter per million British thermal unit (lb/mmBtu).

This limit is based on the following equation:

$$Pt = 0.87 / Q^{0.16}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/mmBtu).

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case the capacity specified in the operation permit shall be used.

D.3.3 Volatile Organic Compounds [326 IAC 8-2-5]

Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), no owner or operator of a facility engaged in the surface coating of paper may cause, allow or permit the discharge into the atmosphere of any volatile organic compounds in excess of 2.9 pounds of VOC per gallon of coating excluding water, delivered to the two (2) reverse rollcoaters.

Compliance Determination Requirements

D.3.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Particulate Matter (PM) and Volatile Organic Compound (VOC) limits specified in Conditions D.3.1, D.3.2 and D.3.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.3.5 Particulate Matter (PM)

Pursuant to 326 IAC 6-1-2(a) (Particulate Emissions Limitations), the twelve (12) baghouses for PM control shall be in operation at all times when the bulk handling operations in Lines 6 & 7 are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.6 Monitoring

Monitoring of these facilities is not required by this permit. However, any change or modification to these facilities, as specified in 326 IAC 2-1 may require these facilities to have monitoring requirements.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.7 Record Keeping Requirements

- (a) To document compliance with Condition D.3.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.3.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

When non-compliant coatings are used, the following records shall be kept:

- (2) A log of the dates of use;

- (3) The volume weighted VOC content of the coatings used for each day;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (7) Line 8, identified as L8, constructed in 1989, with a maximum capacity of 14,000 pounds of products per hour, using thirteen (13) baghouses as control, exhausting to thirteen (13) stacks (BH-13, BH-14, BH-15, BH-16, BH-17, BH-18, BH-19, BH-20, BH-21, BH-22, BH-23, BH-24 and BH-25), consisting of the following equipment:
- (A) Two (2) bag dump stations:
 - (1) One (1) bag dump station (Bag Fill), capacity 4,000 pounds per hour,
 - (2) One (1) bag dump station (Calcium Oxide), capacity 108 pounds per hour,
 - (B) One (1) vacuum receiver, capacity 108 pounds per hour,
 - (C) Ten (10) storage silos with combined capacity of 53,914 pounds per hour,
 - (D) Two (2) reverse roll coaters, capacity of 36,000 square feet of barrier and damper sheet (filled asphaltic sheet) per hour each,
 - (E) One (1) 6.00 million British thermal units per hour (mmBtu/hr) natural gas fired Line 8 oil heater, installed in 1991, identified as FCU-12.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a) (Particulate Emissions Limitations), the PM from the granular material handling operations in Line 8 shall not exceed 0.03 grains per dry standard cubic foot. See the following table for the equivalent pound per hour emissions:

Emission Units/Stack	Flow Rate (acfm)	326 IAC 6-1-2(a) limitation (gr/dscf)	Equivalent limit in pounds per hour
Bag Fill / BH-13	600	0.03	0.15
Bag Fill / BH-14	600	0.03	0.15
Bag Fill / BH-15	600	0.03	0.15
Bag Fill / BH-16	600	0.03	0.15
Bag Fill / BH-17	600	0.03	0.15
Truck Fill / BH-18	600	0.03	0.15
Truck Fill / BH-19	600	0.03	0.15
Truck Fill / BH-20	600	0.03	0.15
Truck Fill / BH-21	600	0.03	0.15
Truck Fill / BH-22	600	0.03	0.15
Bag Dump Station / BH-23	1,000	0.03	0.25
Vacuum Receiver / BH-24	600	0.03	0.15
Bag Dump Station / BH-25	1,000	0.03	0.25

D.4.2 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Emission Limitations for Facilities specified in 326 IAC 6-2-1(c)), the particulate matter emissions from the one (1) 6.0 mmBtu/hr natural gas fired Line 8 oil heater is limited to 0.42 pounds per million British thermal units per hour (lb/mmBtu).

This limitation is based on the following equation:

$$Pt = 1.09 / Q^{0.26}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/mmBtu).

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case the capacity specified in the operation permit shall be used.

D.4.3 Volatile Organic Compound (VOC) [326 IAC 8-2-5]

Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), no owner or operator of a facility engaged in the surface coating of paper may cause, allow or permit the discharge into the atmosphere of any volatile organic compounds in excess of 2.9 pounds of VOC per gallon of coating excluding water, delivered to the two (2) reverse rollcoaters.

Compliance Determination Requirements

D.4.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Particulate Matter (PM) and Volatile Organic Compound (VOC) limits specified in Conditions D.4.1, D.4.2 and D.4.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.4.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.4.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.4.6 Particulate Matter (PM)

Pursuant to 326 IAC 6-1-2(a) (Particulate Emission Limitations), the thirteen (13) baghouses for PM control shall be in operation at all times when the granular material handling operations in Line 8 are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.7 Monitoring

Monitoring of these facilities is not required by this permit. However, any change or modification to these facilities, as specified in 326 IAC 2-1 may require these facilities to have monitoring requirements.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.8 Record Keeping Requirements

- (a) To document compliance with Condition D.4.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.4.3.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

When non-compliant coatings are used, the following records shall be kept:

- (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each day;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.5

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (8) Line 92, identified as L92, constructed in 1966, with a maximum capacity of 3,280 pounds of products per hour, using three (3) baghouses and one (1) thermal oxidizer as control, exhausting to one (1) stack (FCU-4), consisting of the following equipment:
- (A) One (1) fiberglass receiver, maximum capacity of 1,800 pounds per hour,
 - (B) One (1) fiberglass opener,
 - (C) Four (4) virgin cotton fiber bale breakers, maximum capacity of 2,000 pounds per hour each,
 - (D) One (1) conveyor, maximum capacity of 6,000 pounds per hour,
 - (E) One (1) fiber blender opener, maximum capacity of 6,000 pounds per hour,
 - (F) One (1) rotoblender, maximum capacity of 6,000 pounds per hour,
 - (G) One (1) feed hopper,
 - (H) One (1) air lay,
 - (I) One (1) reclaim screen,
 - (J) One (1) classifier,
 - (K) One (1) picker,
 - (L) One (1) resin distributor
 - (M) One (1) 15 million British thermal units per hour natural gas fired incinerator,
 - (N) One (1) 11.20 million British thermal units per hour (mmBtu/hr) natural gas fired Line 92 boiler, installed in 1995, identified as NAVA Oven Boiler, and
 - (O) One (1) 0.5 million British thermal units per hour (mmBtu/hr) natural gas fired Line 92 Dryer, identified as NAVA Oven.
- (10) Line 91, identified as L91, constructed in 1978, with a maximum capacity of 3,823 pounds of product per hour, using three (3) baghouses and one (1) thermal oxidizer as control, exhausting to one (1) stack (FCU-2)(new), consisting of the following equipment:
- (A) One (1) existing rebuilt conventional oven (FCU-1) rated at 9 million British thermal units per hour (mmBtu/hr) connected through new modified duct work to a new thermal oxidizer rated at 15 million British thermal units per hour (mmBtu/hr), using a low NOx burner as control, exhausting to one (1) stack (FCU-2(new)).
 - (B) Four (4) bale breakers;
 - (C) One (1) feed hopper.
 - (D) One (1) fiber opener,
 - (E) One (1) airlay,
 - (F) One (1) classifier,
 - (G) One (1) reclaim screen,
 - (H) One (1) picker,
 - (I) One (1) resin distributor, and
 - (J) Two (2) aspirator tables.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Volatile Organic Compound (VOC) [326 IAC 8-7]

- (a) The input of Volatile Organic Compound (VOC) to the Line 92 and the usage of cleanup solvent for the Line 92 (the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent) shall be limited such that the Volatile Organic Compound (VOC) emissions from the Line 92 and Line 92 NAVA Oven shall not exceed forty-three (43) tons per year when using the thermal oxidizer with 81% overall control efficiency or the overall control efficiency determined in the stack test, whichever is lower. This overall control efficiency and input VOC limitation shall be considered RACT. This input VOC limitation shall be based on the following equation:
$$\text{VOC}_{\text{input}} = \text{VOC}_{\text{limit}} / [1 - (\text{Capture Efficiency})(\text{Destruction Efficiency})]$$
- (b) The input of Volatile Organic Compound (VOC) to the Line 91 and the usage of cleanup solvent for the Line 91 (the usage of cleanup solvent may need to take into account any

recycling of cleanup rags or reused solvent) shall be limited such that the Volatile Organic Compound (VOC) emissions from the Line 91 shall not exceed forty-three (43) tons per year when using the thermal oxidizer with an 81% overall control efficiency or overall control efficiency to be determined in the stack test, whichever is lower. This overall control efficiency and input VOC limitation shall be considered RACT. The input VOC limit shall be based on the following equation:

$$\text{VOC}_{\text{input}} = \text{VOC}_{\text{limit}} / [1 - (\text{Capture Efficiency})(\text{Destruction Efficiency})]$$

D.5.2 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Emission Limitations for Facilities specified in 326 IAC 6-2-1(c)), the particulate matter emissions from the one (1) 11.2 mmBtu/hr natural gas fired Line 92 boiler is limited to 0.40 pounds per million British thermal units per hour (lb/mmBtu).

This limitation is based on the following equation:

$$\text{Pt} = 1.09 / Q^{0.26}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/mmBtu).

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case the capacity specified in the operation permit shall be used.

D.5.3 Particulate Matter (PM) [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a) (Particulate Emissions Limitations), the PM from the Line 91, Line 92, fiber prep and resin recycle shall not exceed 0.03 grains per dry standard cubic foot. See the following table for the equivalent pound per hour emissions:

Emission Units/Stack	Flow Rate (acfm)	326 IAC 6-1-2(a) limitation (gr/dscf)	Equivalent limit in pounds per hour
Line 91 / FCU-2	6,000	0.03	1.54
Line 92 / FCU-4	16,704	0.03	4.29

D.5.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.5.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within 60 days after achieving maximum production rate the Permittee shall perform VOC testing on the Line 91 thermal oxidizer and by March 2004, the Permittee shall perform VOC testing on the Line 92 thermal oxidizer utilizing Method 25A and/or Method 25 or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to those requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

D.5.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.5.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating or resin manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 or other IDEM, OAM approved method in conjunction with the

analytical procedures specified in 326 IAC 8-1-4.

D.5.7 VOC Emissions

Compliance with Condition D.5.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent 12 consecutive month period.

D.5.8 Particulate Matter (PM)

Pursuant to 326 IAC 6-1-2(a) (Particulate Emissions Limitations), the three (3) baghouses for PM control on Line 91 and three (3) baghouses on Line 92 shall be in operation at all times when the Lines are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.5.9 Thermal Incinerator [326 IAC 8-7]

- (a) Pursuant to 326 IAC 8-7 (VOC Reduction Requirements for Lake County), the one (1) 15 million British thermal units per hour (mmBtu/hr) natural gas fired thermal incinerator for the Line 91 conventional oven shall be in operation at all times when the Line 91 conventional oven is in operation. When operating, the thermal incinerator shall maintain a minimum operating temperature of 1,400°F, unless a lower temperature is determined in the compliance test provided for in Section D.5.1 (b). The temperature of the thermal oxidizer at the point of oxidation shall be continuously monitored and recorded whenever any of the facilities are in operation.
- (b) Pursuant to 326 IAC 8-7 (VOC Reduction Requirements for Lake County), the one (1) 17.85 million British thermal units per hour (mmBtu/hr) natural gas fired thermal incinerator for the NAVA oven shall be in operation at all times when NAVA oven is in operation. When operating, the thermal incinerator shall maintain a minimum operating temperature of 1,400°F, unless a lower temperature is determined in the compliance test provided for in Section D.5.1 (a). The temperature of the thermal oxidizer at the point of oxidation shall be continuously monitored and recorded whenever any of the facilities are in operation.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.10 Record Keeping Requirements

- (a) To document compliance with Condition D.5.9, the Permittee shall keep records of thermal incinerator temperatures from the 15 million British thermal units per hour (mmBtu/hr) Line 91 natural gas fired incinerator and the 17.85 million British thermal units per hour natural gas fired Line 92 Incinerator.
- (b) To document compliance with Condition D.5.1, the Permittee shall keep monthly records of input volatile organic compound (VOC) for the Line 92 NAVA oven and the Line 91 conventional oven.
- (c) Pursuant to 40 CFR 60.48c, the permittee shall submit notification of the date of construction, anticipated startup, and actual startup, as provided by § 60.7 of this part for the one (1) 11.2 million British thermal units per hour natural gas fired boiler in Line 92. This notification shall include:
 - (1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.
 - (2) If applicable, a copy of any Federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under § 60.42c, or § 60.43c.
 - (3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping

Requirements, of this permit.

D.5.11 Reporting Requirements

- (a) An annual certification for the 11.2 million British thermal units per hour natural gas fired Line 92 boiler shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the Natural Gas Fired Boiler Certification form located at the end of this permit, or its equivalent, no later than April 15 of each year.
- (b) A quarterly summary of the information to document compliance with Condition D.5.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.6

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (9) One (1) liquid organic storage tank area, identified as VOLS, with a maximum capacity of 227,200 gallons of organic liquid, consisting of the following equipment:
- (A) One (1) fixed roof dome tank, installed in 1989, identified as Line 8 (Flux), storing asphalt, with capacity of 30,000 gallons;
 - (B) One (1) fixed roof dome tank, installed in 1989, identified as Line 8 (Coating), storing asphalt, with capacity of 30,000 gallons;
 - (C) One (1) fixed roof dome tank, installed in 1989, identified as Line 8 B-25, storing asphalt, with capacity of 30,000 gallons;
 - (D) One (1) fixed roof dome tank, installed in 1989, identified as Line 8 Latex #1, storing Latex, with capacity of 3,700 gallons;
 - (E) One (1) fixed roof dome tank, installed in 1989, identified as Line 8 Latex #2, storing Latex, with capacity of 3,700 gallons;
 - (F) One (1) fixed roof dome tank, installed prior to 1970, identified as Process Oil, storing Process Oil, with capacity of 13,500 gallons;
 - (G) One (1) fixed roof dome tank, installed in 1990, identified as Antifreeze #1, storing Antifreeze, with capacity of 1,128 gallons;
 - (H) One (1) fixed roof dome tank, installed in 1990, identified as Antifreeze #2, storing Antifreeze, with capacity of 1,128 gallons;
 - (I) One (1) fixed roof dome tank, installed in 1976, identified as Line 6 & 7 (Flux), storing asphalt, with capacity of 30,455 gallons;
 - (J) One (1) fixed roof dome tank, installed in 1976, identified as Line 6 & 7 (Coating), storing asphalt, with capacity of 30,455 gallons;
 - (K) One (1) fixed roof dome tank, installed in 1976, identified as Line 6 & 7 B-25, storing asphalt, with capacity of 30,455 gallons;
 - (L) One (1) fixed roof dome tank, installed in 1986, identified as Waste Oil, storing Waste Oil, with capacity of 2,970 gallons;
 - (M) One (1) fixed roof dome tank, installed in 1990, identified as HT Oil, storing Heat Transfer Oil, with capacity of 1,128 gallons;
 - (N) One (1) fixed roof dome tank, installed in 1990, identified as Lube Oil, storing Lube Oil, with capacity of 1,128 gallons;
 - (O) One (1) fixed roof dome tank, installed in 1976, identified as Line 6 & 7 Latex, storing Latex, with capacity of 3,700 gallons;
 - (P) One (1) 3.0 million British thermal units per hour (mmBtu/hr) natural gas fired asphalt tank heater, identified as FCU-6;
 - (Q) One (1) 3.0 million British thermal units per hour (mmBtu/hr) natural gas fired asphalt tank heater, identified as FCU-7; and
 - (R) One (1) 3.0 million British thermal units per hour (mmBtu/hr) natural gas fired asphalt tank heater, identified as FCU-8.
- (11) One (1) foam part cell, identified as Foam Cell Injection Molding, under construction in 1997/1998, with a maximum capacity of 4,273.1 pounds of trimmed parts and scrap per hour, consisting of the following equipment:
- (A) Two (2) chemical storage tanks, 8,000 gallon capacity each,
 - (B) One (1) metering system,
 - (C) One (1) robotic injector, and
 - (D) One (1) nitrogen blank system for the chemical storage tanks.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Volatile Organic Compound (VOC) [326 IAC 8-9]

Any change or modification to the liquid organic storage tank area or the Chemical Storage Tanks in the Foam Cell Injection Molding must be approved by the Office of Air Management (OAM) before such change or modification can occur.

Compliance Determination Requirement

D.6.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.6.3 Monitoring Requirements

Monitoring of this facility is not required by this permit. However, any change or modification to this facility as specified in 326 IAC 2-1 may require this facility to have monitoring requirements.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.6.4 Record Keeping Requirements

- (a) The Permittee shall keep records readily accessible of the dimension of each storage vessel and an analysis showing the capacity of each storage vessel for this life of the source for the three (3) fixed roof dome tanks, located in the liquid organic storage tank area, identified as Line 8 (Flux), Line 8 (Coating), and Line 8 B-25.
- (b) Pursuant to 326 IAC 8-9-6 (Volatile Organic Liquid Storage Vessels, Record Keeping and Reporting Requirements), the Permittee shall maintain the following records for the fifteen (15) fixed roof dome tanks and the VOC and HAP storage tanks listed in (Insignificant Activities), located in the liquid organic storage tank area for the life of the source:
 - (1) The vessel identification number.
 - (2) The vessel dimensions.
 - (3) The vessel capacity.

SECTION D.7

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(Insignificant Activity) One (1) 8.38 million British thermal units per hour (mmBtu/hr) natural gas fired boiler, installed prior to 1983, identified as FCU-5.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.7.1 Particulate Matter (PM) [326 IAC 6-2-2]

Pursuant to 326 IAC 6-2-2 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(a)), the particulate matter emissions from the one (1) 8.38 mmBtu/hr boiler shall be limited to 0.54 pounds particulate matter per million British thermal unit (lb/mmBtu).

This limit is based on the following equation:

$$Pt = 0.87 / Q^{0.16}$$

Where:

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/mmBtu).

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case the capacity specified in the operation permit shall be used.

Compliance Determination Requirements

D.7.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Particulate Matter (PM) limit specified in Condition D.7.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.7.3 Monitoring

Monitoring of this facility is not required by this permit. However, any change or modification to this facility as specified in 326 IAC 2-1 may require this facility to have monitoring requirements.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Rieter Automotive North America, Inc.
Source Address: 101 West Oakley Avenue, Lowell, Indiana 46356-2206
Mailing Address: 101 West Oakley Avenue, Lowell, Indiana 46356-2206
Part 70 Permit No.: T089-6629-00013

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Rieter Automotive North American, Inc.
Source Address: 101 West Oakley Avenue, Lowell, Indiana 46356-2206
Mailing Address: 101 West Oakley Avenue, Lowell, Indiana 46356-2206
Part 70 Permit No.: T089-6629-00013

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2	
9	1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9	2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) C The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Rieter Automotive North America, Inc.
Source Address: 101 West Oakley Avenue, Lowell, Indiana 46356-2206
Mailing Address: 101 West Oakley Avenue, Lowell, Indiana 46356-2206
Part 70 Permit No.: T089-6629-00013

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Report period

Beginning: _____

Ending: _____

Boiler Affected

Alternate Fuel

Days burning alternate fuel

From

To

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature: _____

Printed Name: _____

Title/Position: _____

Date: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Rieter Automotive North America, Inc.
Source Address: 101 West Oakley Avenue, Lowell, Indiana 46356-2206
Mailing Address: 101 West Oakley Avenue, Lowell, Indiana 46356-2206
Part 70 Permit No.: T089-6629-00013
Facility: Line 91 and Line 92
Parameter: VOC
Limit: 43 tons VOC per year each line

YEAR: _____

Month		Column 1	Column 2	Column 3	Column 4	[Column 1 * (1 - Column 2)] + [Column 3 * (1 - Column 4)]
		VOC Input This Month (tons)	Overall Control Efficiency (%)	VOC Input Previous 11 Months (tons)	Overall Control Efficiency (%)	VOC Emissions 12 Month Total (tons)
	Line 91					
	Line 92					
	Line 91					
	Line 92					
	Line 91					
	Line 92					

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Rieter Automotive North America, Inc.
Source Address: 101 West Oakley Avenue, Lowell, Indiana 46356-2206
Mailing Address: 101 West Oakley Avenue, Lowell, Indiana 46356-2206
Part 70 Permit No.: T089-6629-00013
Facility: Hot Molding Department
Parameter: Production
Limit: 10, 626 tons per twelve consecutive month period with compliance determined at the end of each month

Year: _____

Month	Production this month (tons)	Production previous 11 months (tons)	Production 12 months total (tons)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Rieter Automotive North America, Inc.
Source Address: 101 West Oakley Avenue, Lowell, Indiana 46356-2206
Mailing Address: 101 West Oakley Avenue, Lowell, Indiana 46356-2206
Part 70 Permit No.: T089-6629-00013
Facility: CJ line
Parameter: Production
Limit: 12,121 tons per twelve consecutive month period with compliance determined at the end of each month.

Year: _____

Month	Production this month (tons)	Production previous 11 months (tons)	Production 12 months total (tons)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Rieter Automotive North America, Inc.
Source Address: 101 West Oakley Avenue, Lowell, Indiana 46356-2206
Mailing Address: 101 West Oakley Avenue, Lowell, Indiana 46356-2206
Part 70 Permit No.: T089-6629-00013
Facility: Department 44
Parameter: Production
Limit: 23, 232 tons per twelve consecutive month period with compliance determined at the end of each month

Year: _____

Month	Production this month (tons)	Production previous 11 months (tons)	Production 12 months total (tons)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Rieter Automotive North America, Inc.
Source Address: 101 West Oakley Avenue, Lowell, Indiana 46356-2206
Mailing Address: 101 West Oakley Avenue, Lowell, Indiana 46356-2206
Part 70 Permit No.: T089-6629-00013

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Significant Permit Modification

Source Name: Rieter Automotive North America, Inc.
Source Location: 101 West Oakley Avenue, Lowell, Indiana 46356
County: Lake
Permit No.: 089-12599-00013
SIC Code: 3714
Permit Reviewer: drpoole

On July 31, 2002, the Office of Air Quality (OAQ) had a notice published in the Merrillville Post Tribune, Merrillville, Indiana, stating that Rieter Automotive North America, Inc. had applied for a significant permit modification to their Title V permit. The notice also stated that OAQ proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On August 19, 2002, Rieter Automotive North America, Inc. submitted comments on the proposed modification. The summary of the comments and corresponding responses is as follows:

Comment #1

In reviewing the Draft 089-12599 First Significant Permit Modification to Part 70 089-6629-00013 for Rieter Automotive North America, Inc., dated July 26, 2002; and a telephone conversation between the writer and Donald Poole, Rieter Automotive North America has determined that the parameters that were raised in the change request received by you on July 19, 1999 were resolved by the 089-15315 First Minor Source Modification to Part 70 permit No. 089-6629-00013 dated May 2, 2002 and again with the 089-15455 First Significant Permit Modification to Part 70 permit No. 089-6629-00013 dated July 30, 2002. As noted, Rieter Automotive North America has received the First Significant Source Modification to Part 70 permit No. 089-6629-00013 which was issued July 30, 2002. The draft was dated July 26, 2002 with the same name. How can we have two First Significant Permit Modifications to the same permit?

Response #1

One of the documents, whether 089-15455 or 089-12599, was incorrectly titled as the First Significant Permit Modification. This was a mistake. Therefore, 089-12599 will now be titled as the Second Significant Permit Modification. This will be changed throughout the document.

Comment #2

That notwithstanding, the language being added is not in the body of the permit but is covered in the TSD of the original permit 089-6629-00013 on pages 14, 15, 16, and 17 of 32 and was generated by the Permit Reviewer Cathie Moore, copy attached. For these reasons, we request that this modification be removed from public notice and that the Part 70 permit remain as currently written.

The new language and reporting forms asked for and limits the VOC inputs to the Hot Mold Department, CJ line, and Department 44. This information is not obtainable because the input to these lines is from the padding lines. The VOC from these lines are based on emission factors that were developed from a stack test that was conducted at the time of the permit request, copies are attached.

Our comments on the subject Draft Operating Permit along with the attachments of the January 1995 stack test that were run on the subject lines, the TSD pages 14 thru 17 of 32 ,and the proposed new reporting forms for the three departments follow.

Comment 1) Page 32 of 54 First Significant Permit Modification 089-12599 Modified by: drp, Section D.1.3 Site Specific Reasonably Available Control Technology [326 IAC 8-1-5] should be revised as follows:

- a) Pursuant to 326 IAC 8-1-5, RACT for the Hot Mold Department shall be that:
 - 1) The VOC emission from the Hot Mold Department shall not exceed 5.33 pounds VOC per ton of production, and total production shall not exceed ten thousand six hundred and twenty six (10,626) tons per 12 consecutive month period. These limits will effectively limit VOC emissions to less than 28.32 tons per 12 consecutive period.
- b) Pursuant to 326 IAC 8-1-5, RACT for the CJ line shall be that:
 - 1) The VOC emission from the CJ line shall not exceed 0.198 pounds VOC per ton of production and total production shall not exceed twelve thousand one hundred and twenty-one (12,121) tons per 12 consecutive month period. These limits shall effectively limit VOC emissions to less than 1.2 tons per 12 consecutive period.
- c) Pursuant to 326 IAC 8-1-5, RACT for Department 44 shall be that:
 - 1) The VOC emission from Department 44 shall not exceed 0.198 pounds VOC per ton of production and total production shall not exceed twenty-three thousand two hundred and thirty two (23,232) tons per 12 consecutive month period. These limits shall effectively limit VOC emissions to less than 2.3 tons per 12 consecutive period.

Response #2

Input amounts cannot be tracked by the company. Therefore, the limitations have been proposed as above. The limits shall be adjusted as proposed by the company.

- a) Pursuant to 326 IAC 8-1-5, RACT for the Hot Molding Department shall be that:
 - 1) ~~The VOC input shall be limited to 28.32~~ **emissions shall not exceed 5.33 pounds of VOC per ton of production. Total production shall not exceed ten thousand six hundred and twenty six (10,626) tons per twelve consecutive month period with compliance determined at the end of each month. These limits will limit VOC emissions to less than 28.32 tons per twelve consecutive month period.**
 - 2) The equipment be operated in an efficient manner.
- b) Pursuant to 326 IAC 8-1-5, RACT for the CJ line shall be that:
 - 1) ~~The VOC input shall be limited to 1.2~~ **emissions shall not exceed 0.198 pounds of VOC per ton of production. Total production shall not exceed twelve thousand one hundred and twenty one (12, 121) tons per twelve consecutive month period with compliance determined at the end of each month. These limits will limit VOC emissions to less than 1.2 tons per twelve consecutive month period.**
 - 2) The equipment be operated in an efficient manner.
- c) Pursuant to 326 IAC 8-1-5, RACT for Department 44 shall be that:
 - 1) ~~The VOC input shall be limited to 2.3~~ **emissions shall not exceed 0.198 pounds of VOC per ton of production. Total production shall not exceed twenty three thousand two hundred and thirty two (23, 232) tons per twelve consecutive month period with compliance determined at the end of each month. These limits will limit VOC emissions to less than 2.3 tons per twelve consecutive month period.**

- 2) The equipment be operated in an efficient manner.

Additionally, the report forms have been adjusted to match these changes.

Comment #3

Comment 2) Page 33 of 54 First Significant Permit Modification 089-12599 Modified by: drp, Section D.1.6 Record Keeping Requirements should be revised as follows:

To document compliance with Condition D.1.3(a), (b), and (c), the Permittee shall maintain monthly records of production from the Hot Molding Department, CJ line, and Department 44.

Response #3

The adjustment to Condition D.1.6 will also be made.

To document compliance with Condition D.1.3(a), (b), and (c), the Permittee shall maintain **monthly** records ~~of the amount of VOC material used for each facility~~ **of production from the Hot Molding Department, CJ line, and Department 44.**

After further review, IDEM, OAQ has determined to change the following:

- 1) Condition D.1.4 will be added and all succeeding conditions will be renumbered.

D.1.4 VOC Emission Limits [326 IAC 8-7-3]

For the Hot Molding Department, CJ line, and Department 44, the facilities shall:

- a) Achieve an overall VOC reduction from baseline actual emissions of at least ninety-eight percent (98%) by the documented reduction in use of VOC containing materials or install an add-on control system that achieves an overall control efficiency of ninety-eight percent (98%), or**
- b) Where it can be demonstrated by the source that control technology does not exist that is reasonably available and both technologically and economically feasible to achieve a ninety-eight percent (98%) reduction in VOC emissions, a source shall achieve an overall VOC reduction of at least eighty-one percent (81%) from baseline actual emissions with the documented reduction in use of VOC containing materials or install an add-on control system that achieves an overall control efficiency of eighty-one percent (81%).**

- 2) A statement will be added to Condition D.1.3 stating that:

These conditions are not federally enforceable.

**Indiana Department of Environmental Management
Office of Air Quality**

**Technical Support Document (TSD) for a Significant Permit Modification to
a Part 70 Operating Permit**

Source Background and Description

Source Name:	Rieter Automotive North America, Inc.
Source Location:	101 West Oakley Avenue, Lowell, Indiana 46356-2206
County:	Lake
SIC Code:	3714
Operation Permit No.:	089-6629-00013
Operation Permit Issuance Date:	June 16, 1999
Amendment No.:	089-12599-00013
Permit Reviewer:	drpoole

The Office of Air Quality (OAQ) has reviewed a significant permit modification application from Rieter Automotive North America, Inc. relating to changes to their Title V permit.

Explanation of Amendment

Issue No. 1

During the public comment period, IDEM properly made changes to draft permit conditions D.5.1(a) and (b) to reflect that Rieter's compliance with the VOC emission limitations for lines 91 and 92 are not to be based on VOC input, but are properly based on emissions after controls and factors developed from engineering tests quantifying the emissions from these processes. IDEM however failed to make all of the changes necessary to reflect this basis for determining compliance. Permit Conditions D.5.1(a), D.5.1(b), D.5.6, D.5.7, D.5.10(b), and the Part 70 Quarterly Report Form all require revision to eliminate references to VOC input, content, and usage in determining compliance.

Response to Issue No. 1

The conditions in D.5.1 and D.5.2 have their limitations based upon the input of VOC to Lines 91 and 92. These input limitations are then explained to be equal to the VOC emissions divided by the overall control efficiency. Therefore, the limitation is still based upon usage but a calculation is being made to get it into a usage format.

A request is made to make the VOC emissions dependent upon another equation proposed by the company. This equation is based upon other emission factors. There are no testing language related to these emission factors in the permit. OAQ would not be able to accept the use of these factors without additional testing.

Based upon these reasons, the changes requested for the D.5 conditions will not be made.

Issue No. 2

A typographical error in the designation of HETT-2 should be corrected.

Response to Issue No. 2

The facility description language in Section D.1.1 will be corrected. D.1.1(1)(D) shall be changed to:

Two (2) mold presses, identified as HETT-1, HETT-22, and HETT-3, each with a maximum capacity of 622 pounds of pads and 10.2 pounds of DOW films per hour, all exhausting to stack HV-1.

Issue No. 3

The time frame for conducting a stack test of Line 92 thermal oxidizer should be changed to allow the stack test done on March 17, 1999 to qualify.

Response to Issue No. 3

The Compliance Data Section has determined that this test will meet the testing requirements of this permit. Condition D.5.5 is being adjusted in Significant Permit Modification 089-15455. Therefore, no adjustment will be made here.

Issue No. 4

A new permit condition should be added to identify rule 326 IAC 8-7 as the VOC rule applicable to the Hot Mold Department (except for HETT-1 and HETT-2), the foam part line, the CJ line and Department 44.

Response to Issue No. 4

Pages 13 through 25 of the Technical Support Document made an examination of rule 8-7 as it applied to the Hot Molding Department, the FP line, the CJ line, and Department 44. The conclusion of this analysis was "Based on the information presented in this section, it has been determined that it is economically not feasible to achieve 81% control of this source and proposes that the current design of the facility should be considered RACT." This would state that the company has chosen option (3) from rule 326 IAC 8-7-3. This option states "Achieve an alternative overall emission reduction with the application of reasonably available control technology (RACT) that has been determined as reasonably available by the U.S. EPA and the department. A petition developed in accordance with the procedures in 326 IAC 8-1-5 shall accompany the request for an alternative overall emission reduction. The petition shall be submitted to the department on or before December 31, 1994. The department may approve an extension until February 28, 1995 for submittal of the petition provided the request is received by the department prior to December 31, 1994." However, the company did not provide a petition to the department prior to December 31, 1994. The RACT for the operations involved will be processed under rule 326 IAC 8-1-5 and not under option (3) of rule 326 IAC 8-7-3.

The FP line was installed in 1995. This post dated the rule and therefore rule 8-7 did not apply to the FP line. 326 IAC 8-1-6 would also not apply to the FP line because the potential to emit VOC is at 0.67 tons per year. This is less than 25 tons per year. The Hot Molding Department, the CJ line, and Department 44 all were installed prior to 1995 and rule 8-7 applied to these operations. However, the source never did submit a RACT request for these operations related to option (3). This significant permit modification will include a RACT for these operations. The RACT will be determined to be the current design for each operation.

Condition D.1.3 shall be added as:

D.1.3 Site Specific Reasonably Available Control Technology [326 IAC 8-1-5]

(a) Pursuant to 326 IAC 8-1-5, RACT for the Hot Molding Department shall be that:

- 1) The VOC input shall be limited to 28.32 tons per 12 consecutive month period with compliance determined at the end of each month and**
- 2) The equipment be operated in an efficient manner.**

(b) Pursuant to 326 IAC 8-1-5, RACT for the CJ line shall be that:

- 1) The VOC input shall be limited to 1.2 tons per 12 consecutive month period**

- with compliance determined at the end of each month and
- 2) The equipment be operated in an efficient manner.
- (c) Pursuant to 326 IAC 8-1-5, RACT for Department 44 shall be that:
- 1) The VOC input shall be limited to 2.3 tons per 12 consecutive month period with compliance determined at the end of each month and
- 2) The equipment be operated in an efficient manner.

Prior Conditions D.1.3 and D.1.4 shall be renumbered.

Condition D.1.6 shall be added:

D.1.6 Record Keeping Requirements

To document compliance with Condition D.1.3(a), (b), and (c), the Permittee shall maintain records of the amount of VOC material used for each facility.

Condition D.1.7 shall be added:

D.1.7 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.3(a), (b), and (c) shall be submitted to the addresses, listed in Section C - General Reporting Requirements, of this permit using the reporting forms located at the end of the permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

As required by rule 8-1-5, these site-specific RACT plans will be submitted to EPA as a SIP revision.

Additionally, the following report forms have been added:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Rieter Automotive North America, Inc.
Source Address: 101 West Oakley Avenue, Lowell, Indiana 46356-2206
Mailing Address: 101 West Oakley Avenue, Lowell, Indiana 46356-2206
Part 70 Permit No.: T089-6629-00013
Facility: Hot Molding Department
Parameter: VOC input
Limit: 28.32 tons per 12 consecutive month period

Year: _____

Month	VOC input this month (tons)	VOC input previous 11 months (tons)	VOC input 12 months total (tons)

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9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Rieter Automotive North America, Inc.
Source Address: 101 West Oakley Avenue, Lowell, Indiana 46356-2206
Mailing Address: 101 West Oakley Avenue, Lowell, Indiana 46356-2206
Part 70 Permit No.: T089-6629-00013
Facility: CJ line
Parameter: VOC input
Limit: 1.2 tons per 12 consecutive month period

Year: _____

Month	VOC input this month (tons)	VOC input previous 11 months (tons)	VOC input 12 months total (tons)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Rieter Automotive North America, Inc.
Source Address: 101 West Oakley Avenue, Lowell, Indiana 46356-2206
Mailing Address: 101 West Oakley Avenue, Lowell, Indiana 46356-2206
Part 70 Permit No.: T089-6629-00013
Facility: Department 44
Parameter: VOC input
Limit: 2.3 tons per 12 consecutive month period

Year: _____

Month	VOC input this month (tons)	VOC input previous 11 months (tons)	VOC input 12 months total (tons)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Issue No. 5

A new permit condition should be added to page 36 of 53 identifying Condition D.3.3 as a Compliance Determination Requirement for the Lines 6 and 7 coaters.

Response to Issue No. 5

Condition D.3.3 contains a limitation of 2.9 pounds of VOC per gallon of coating less water and is properly contained in the Limitations and Standards Section.

Issue No. 6

The permit should clarify whether 326 IAC 8-7 applies to HETT-1 and HETT-2.

Response to Issue No. 6

326 IAC 8-7 should not apply to HETT-1 and HETT-2. These mold presses post date the May 31, 1995 date in the rule. Therefore, this rule does not apply. Additionally, these are not coating facilities, which makes rule 8-7-6 not apply. Additionally, rule 8-1-6 does not apply to HETT-1 and

HETT-2 because the potential to emit of each are less than 25 tons per year.

Justification for the Modification

The Part 70 Operating permit is being modified through a Part 70 Significant Permit Modification. This modification is being performed pursuant to 326 IAC 2-7-12(d)(1). These "procedures shall be used for applications requesting Part 70 permit modifications that do not qualify as minor permit modifications or as administrative amendments."

Recommendation

The staff recommends to the Commissioner that the Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on July 19, 1999.

Conclusion

This Significant Permit Modification shall be subject to the conditions of the attached **Permit No. 089-12599-00013**.